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Further, Applicant's strong rationale as to why no fair prior art suggestion to combine the references as proposed remains unrebutted.

Accordingly, Applicant preserves for appeal its observations that modifying Barnett et al. to download the coupons automatically as now recited in the case of the present advertisements would defeat a purpose of Barnett et al. (to allow a user to decide what coupons to download) and thus would be improper under MPEP §2143.01 (citing In re Gordon), rendering the present claims patentable.

In addition, the allegation that it would have been obvious to modify Barnett et al. to access a Web site by clicking on one of its coupons because Landsman et al. teaches accessing Web sites when advertisements are clicked continues to lack support in the prior art. Regardless of whether advertising information can be contained in the coupons of Barnett et al., they remain coupons intended to be printed out and redeemed. That is why, as the examiner has been forced to confess, Barnett et al. nowhere teaches accessing web sites by clicking its coupons. Landsman et al. is not directed to coupons or for that matter to advertising contained in coupons.

The proffered motivation to combine - "to provide the users of Barnett with a familiar interface and an ability to access further advertisement information" - fails to bear any relevance to the reference (Barnett et al.) sought to be modified. Specifically, users of Barnett et al. already have a "familiar interface" (a browser), and nowhere does Barnett et al. motivate accessing further information, because it is directed to increasing sales through coupons, not to marketing through advertising. Indeed, Barnett et al.'s casual comment that its coupon file might include advertising (the fact that the advertising consists of "graphics, text, etc." is irrelevant because regardless of its format it is all contained in the coupon file) is simply inadequate to motivate the skilled artisan to toss in the ability to access a web site by clicking on the coupon, *because*

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*the user already is at the intended web site of Barnett et al. by virtue of affirmatively downloading the coupons.* Applicant has quite accurately characterized Barnett et al. and has correctly noted for the above reasons that Barnett et al. and Landsman et al. are apples and oranges, a point that the Board most assuredly will not brush off so lightly.

The Examiner is cordially invited to telephone the undersigned at (619) 338-8075 for any reason which would advance the instant application to allowance.

Respectfully submitted,

  
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